

**AFFIDAVIT OF MERIT**

STATE OF OHIO)

COUNTY OF FRANKLIN ) ss.

I, Paul W. Gabriel, M.D., first having been duly sworn according to law, do hereby depose and state as follows:

1. My name is Paul W. Gabriel and I am of sound mind, lawful age, and in all other respects competent to make this affidavit;
2. I attended the University of Virginia where I obtained a Bachelor's Degree with Distinction in 1975;
3. I obtained my medical degree from Emory University School of Medicine in 1980;
4. I am licensed to practice medicine by the State Medical Board of Ohio. My medical specialty is emergency medicine. I am certified by the American Board of Emergency Medicine. I am presently Chairman of the Department of Emergency Medicine at Grant Medical Center, Columbus, Ohio;
5. My clinical experience in Emergency Medicine has been with:
  - West Georgia Medical Center: 1982-1983
  - Redmond Park Hospital: 1984-1985
  - Ohio State University Hospital: 1988-1989
  - Riverside Methodist Hospital: 1988-1992
  - Hilton Head Hospital: 1992-1994
  - Union County Memorial Hospital: 1994-2001
  - Grant Medical Center: 2001-Present
6. I devote more than half of my professional time to the active clinical practice of medicine in my field of licensure or to its instruction of an accredited school;
7. I am familiar with the applicable standard of care or treatment of patients suffering detoxification;
8. I have thoroughly reviewed the following records reasonably available to the Plaintiff concerning the allegations contained in the Complaint:
  - 1) Municipal Court Charges (pp 1-3)
  - 2) Booking Photo (1 pg)



- 3) Jail Records (pp 1-97)
- 4) Incident Report dated May 8, 2022 (1 pg)
- 5) Incident Report dated May 10, 2022 (1 pg)
- 6) Incident Report dated May 11, 2022 (pp 1-2)
- 7) Mansfield Fire EMT (pp 1-3)
- 8) Mansfield Hospital Records (pp 1-7)
- 9) Postmortem Examination Report by Susan L. Brown DO Forensic Pathologist (pp 1-6)
- 10) Toxicology Report Montgomery Coroner's Office dated June 2, 2022 (pp 1-2)
- 11) Richland County Coroner's Report (pp 1-4)
- 12) Richland County Sheriff Internal Investigation (pp 1-8)
- 13) Death Certificate (1 p)
- 14) Letter from Dr. Lofgreen PhD dated January 26, 2023 (pp 1-2)
- 15) Pictures of Maggie Copeland, Deceased at OhioHealth Mansfield Hospital;
- 16) Pictures of Maggie Copeland, Deceased at Richland County Jail

9. Based upon my review of the records, my education, training, and experience, it is my Opinion, based upon a reasonable degree of medical certainty, that Advanced Correctional Healthcare Inc., Chuka Onyeneke MD, Christine Williams LPN, Kelly Weaver LPN, Christopher Smith LPN, and Madison Nicole Conrad Hogie LPN fell below the standard of care for detoxification of a drug dependent patient;

10. The aforementioned breach of the standard of care caused severe injury to Maggie Jane Copeland which ultimately resulted in her death.

Further affiant sayeth not.

Paul W. Gabriel MD  
Paul W. Gabriel, MD

Sworn to before me and subscribed in my presence this 2nd day of August,

2023.



Linda L. Bartel  
Notary Public, State of Ohio  
My Commission Expires 10-2024 NOTARY PUBLIC

Linda L. Bartel